

Appl. No. 09/920,198  
Amdt. Dated April 27, 2005  
Reply to Office Action of February 28, 2005

Docket No. IRI 05419  
Customer No. 23330

### **REMARKS**

Claim 1 is amended. Claims 1-20 remain in the application. The actions taken are in the interest of expediting prosecution and with no intention of surrendering any range of equivalents to which Applicants would otherwise be entitled in view of the prior art. Moreover, the amendment or cancellation of claims herein is without prejudice to pursuing claims of different scope by way of continuing Application. Reconsideration of this application is respectfully requested.

### **U.S.C. §112 second paragraph**

Claims 1 is rejected under U.S.C. §112, second paragraph, as being indefinite for ambiguity as to what is in the second network. Claim 1 has been amended to correct the ambiguity as to what is in the second network, rendering this rejection moot.

### **U.S.C. 102(b)**

Claims 1, 2, 6, 7, 10, 13, 14, 15, 17 and 18 are rejected under U.S.C. §102(b) as being anticipated Toth et al. (U.S. Patent No. 5,708,655, hereinafter Toth). Applicants respectfully traverse the rejection. Applicant's independent claims 1 and 10 call for, among other things, a first and second security controller located respectively in a first and second network, a user requesting secure multimedia services, and said first security controller selecting one of the plurality of first network elements for coupling to the second network; and said second security controller selecting one of the plurality of second network elements for dynamically coupling to the selected one of the plurality of first network elements.

Toth teaches a wireless communication system with a dynamically-assigned address which provides a temporary address to route data (abstract). The Examiner's interpretation of Toth is curious. The Examiner claims that Toth includes the recited elements of Applicant's independent claims. However, the only elements the Examiner points to are a serving packet switch node (SPSN) (38), a gateway packet switch node (GPSN) (26, 46) and an Internet protocol address server (IAS) (28, 48). In fact, none of these cited elements, nor any other

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elements in Toth function as a first or second security controller. Further, there is no mention of requesting or providing secure multimedia services anywhere in Toth, as Toth is not directed toward, and does not teach the request or transfer of secure data. Still further, Toth does not teach or suggest a first security controller selecting one of the plurality of first network elements for coupling to the second network; and said second security controller selecting one of the plurality of second network elements for dynamically coupling to the selected one of the plurality of first network elements.

Since Toth does not teach each element of Applicant's independent claims 1 and 10, Toth does not anticipate Applicant's independent claims 1 and 10. Therefore, it is respectfully requested that the rejection be withdrawn and the claims proceed to allowance.

Claims 2-9 depend, either directly or indirectly, from independent claim 1 and are allowable over the cited art for the same reasons as claim 1.

Claims 11-20 depend, either directly or indirectly, from independent claim 10 and are allowable over the cited art for the same reasons as claim 10.

### U.S.C. 103

Claims 3, 4, 5, 11 and 12 are rejected under U.S.C. §103 as being unpatentable over Toth in view of Ekbert, WO 00/02406. Claims 8, 9, 19 and 20 are rejected under U.S.C. §103 as being unpatentable over Toth in view of Vilander et al. (U.S. Patent No. 6,554,219, hereinafter Vilander) in further view of UMTS Release 1999, 3GPP, 1999.

It is incumbent upon the Examiner to prove a *prima facie* case of obviousness (MPEP 2142). To establish a *prima facie* case three basic criteria must be met. First, the prior art reference must teach or suggest all the claim limitations. Second, there must be a reasonable expectation of success. Finally, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference.

Applicants respectfully traverses this rejection as all of the claimed elements are not found in the cited references. As shown above, Toth does not disclose all of the elements of Applicant's independent claims 1 and 10. The cited references of Ekbert, Vilander and UMTS Release 1999, individually or in combination, do not make up for this deficiency. For example,

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Ekbert only discloses one security server (SS) and does not teach or describe a first security controller selecting one of the plurality of first network elements for coupling to the second network; and said second security controller selecting one of the plurality of second network elements for dynamically coupling to the selected one of the plurality of first network elements. Therefore, the cited references cannot make obvious Applicant's independent claims 1 and 10. Therefore, it is respectfully requested that the rejection be withdrawn and the claims proceed to allowance.

Claims 2-9 depend, either directly or indirectly, from independent claim 1 and are allowable over the cited art for the same reasons as claim 1.

Claims 11-20 depend, either directly or indirectly, from independent claim 10 and are allowable over the cited art for the same reasons as claim 10.

### Summary

No amendment made was related to the statutory requirements of patentability unless expressly stated herein. No amendment made was for the purpose of narrowing the scope of any claim, unless Applicant has argued herein that such amendment was made to distinguish over a particular reference or combination of references.

The Applicants believe that the subject application, as amended, is in condition for allowance. Such action is earnestly solicited by the Applicants.

In the event that the Examiner deems the present application non-allowable, it is requested that the Examiner telephone the Applicant's attorney or agent at the number indicated below so that the prosecution of the present case may be advanced by the clarification of any continuing rejection.

Accordingly, this application is believed to be in proper form for allowance and an early notice of allowance is respectfully requested.

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Please charge any fees associated herewith, including extension of time fees, to 502117.

Respectfully submitted,

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